

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| In re: | : | Chapter 11 |
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| DOCUDATA SOLUTIONS, L.C., <i>et al.</i> , | : | Case No. 25-90023 (CML) |
| | : | |
| Debtors. ¹ | : | (Joint Administration Requested) |
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| | X | |

**AMENDED AGENDA OF DEBTORS FOR
MATTERS SET FOR HEARING ON MARCH 4, 2025**

The debtors in possession in the above-captioned cases (collectively, the “***Debtors***”), file this Agenda of matters set for hearing on **March 4, 2025, at 11:30 a.m. (prevailing Central Time)**.

A. First Day Motions

1. ***First Day Hearing Presentation.*** Notice of Filing of First Day Presentation [Docket No. 35]

Status: This matter is going forward.

2. ***Joint Administration Motion.*** Emergency Motion of Debtors for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 2]

Status: This matter is going forward.

3. ***Complex Case Designation.*** Notice of Designation as Complex Bankruptcy Case [Docket No. 3]

Status: This matter is going forward.

4. ***Claims, Noticing, and Solicitation Agent Retention Application.*** Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention of Omni Agent Solutions, Inc. as Claims, Noticing, and Solicitation Agent [Docket No. 4]

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://omniagentsolutions.com/DocuDataSolutions>. The Debtors’ mailing address for the purposes of these cases is 2701 E. Grauwlyer Road, Irving, TX 75061 USA.

Status: This matter is going forward.

5. ***Creditor Matrix Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to File a Consolidated Creditor Matrix and List of the 30 Largest Unsecured Creditors; (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information; (III) Approving the Form and Manner of Notice of Commencement; and (IV) Granting Related [Docket No. 17]

Status: This matter is going forward.

6. ***Schedules Extension Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Extending the Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and 2015.3 Reports; and (II) Granting Related Relief [Docket No. 18]

Status: This matter is going forward.

7. ***DIP Motion.*** Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Authorizing the Use of Cash Collateral, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [Docket No. 5]

- ***Revised Proposed Order.*** Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Authorizing the Use of Cash Collateral, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [Docket No. 39]

Status: This matter is going forward.

8. ***Securitization Motion.*** Emergency Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Certain Debtors to Continue Selling, Contributing and Servicing Receivables and Related Rights Pursuant to the Securitization Program, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 9]

Status: This matter is going forward.

9. ***Cash Management Motion.*** Emergency Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Existing Cash Management System, (B) Maintain Existing Business Forms, and (C) Continue Intercompany Arrangements and Transactions and (II) Granting Related Relief [Docket No. 10]

- ***Revised Proposed Order.*** Interim Order (I) Authorizing Debtors to (A) Continue Existing Cash Management System, (B) Maintain Existing Business Forms, and (C) Continue Intercompany Arrangements and Transactions and (II) Granting Related Relief [Docket No. 42]

Status: This matter is going forward.

10. ***Customer Programs Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Honor Prepetition Obligations to Customers and (B) Continue Customer Programs and (II) Granting Related Relief [Docket No. 11]

Status: This matter is going forward.

11. ***Wages Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Certain Employee Compensation and Benefits and (B) Maintain and Continue Such Benefits and Other Employee-Related Programs; (II) Granting Relief from Automatic Stay with Respect to Workers' Compensation Claims; and (III) Granting Related Relief [Docket No. 8]

Status: This matter is going forward.

12. ***Taxes Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 12]

Status: This matter is going forward.

13. ***Essential Creditors Motion.*** Emergency Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Trade Claims in the Ordinary Course of Business; (II) Confirming Administrative Expense Priority of Undisputed and Outstanding Prepetition Orders; (III) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (IV) Granting Related Relief [Docket No. 14]

- ***Revised Proposed Order.*** Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Trade Claims in the Ordinary Course of Business; (II) Confirming Administrative Expense Priority of Undisputed and Outstanding Prepetition Orders; (III) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (IV) Granting Related Relief [Docket No. 43]

Status: This matter is going forward.

14. ***Insurance Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Insurance Obligations, (B) Maintain Insurance Policies Postpetition, (C) Maintain the Bonding Program, (D) Maintain Postpetition Financing of Insurance Premiums, and (E) Honor Letters of Credit and (II) Granting Related Relief [Docket No. 13]

Status: This matter is going forward.

15. ***NOL Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of

Interests in the Debtors and (B) Claims of Certain Worthless Stock Deductions, and (II) Granting Related Relief [Docket No. 16]

Status: This matter is going forward.

16. ***Utilities Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, (II) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utilities, (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance, and (IV) Granting Related Relief [Docket No. 15]

Status: This matter is going forward.

B. Related Documents

1. ***First Day Declaration.*** Declaration of Randall S. Eisenberg in Support of Chapter 11 Petitions and First Day Motions [Docket No. 6]
2. ***DIP Financing and Securitization Declaration.*** Declaration of Steven Spitzer in Support of (A) the Debtors' DIP Motion and (B) The Debtors' Securitization Program Motion [Docket No. 7]
3. ***Debtors' Witness and Exhibit List*** [Docket No. 20]

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Dated: March 4, 2025
Houston, Texas

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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*Proposed Co-Counsel for the Debtors
and Debtors in Possession*

CERTIFICATE OF SERVICE

I certify that on March 4, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II

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